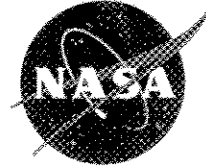


National Aeronautics and Space Administration  
Headquarters  
Washington, DC 20546-0001



November 9, 2009

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA Employees at an STS-129  
Pre-Launch Reception hosted by United Space Alliance on November 11, 2009

NASA invitees, accompanied by their spouse or a guest, may attend a pre-launch reception sponsored by United Space Alliance (USA), and co-sponsors Lockheed Martin and the Boeing Company at the Hilton, Cocoa Beach, in Florida, on November 11, 2009, from 8:00 p.m.-11:00 p.m. This event will provide NASA employees the opportunity to discuss the mission, the shuttle program, other NASA space programs with community and aerospace industry representatives who are interested in NASA's mission and programs. Attendance also serves to reinforce the nature of the integrated Government/Industry Team that makes up the civilian space program.

This event will be a widely-attended gathering of approximately 600 representatives of government, the aerospace industry and the community. Food and refreshments will be served at a cost of approximately \$34.00 per person. I find that the reception meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g)(2). I have determined that free attendance at the above mentioned reception is in the interest of the agency because it will further agency programs and operations. Accordingly, NASA employees who have been invited to attend may accept free attendance at the event. They may also accept invitations for accompanying spouses or guests.

However, NASA employees whose duties may substantially affect the event sponsors, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.204(g)(3)(i), regarding participation in this event from their local ethics counselor.

Moreover, NASA employees who are in non-career positions in which Executive Order 13490 requires signing an ethics pledge may only attend if they reimburse the sponsors the cost of the reception for themselves and any accompanying guest.

*for Rebecca J. Greenstone*  
Adam F. Greenstone